REMARKS

Claims 1 and 3-9 and 12-19 remain presented for active reconsideration. Claims 2 and 10-11 have been cancelled without prejudice or disclaimer. Claim 20 has been newly added.

The Drawings have been objected to for containing hand written reference numerals that are difficult to read. In response, attached here to are computer generated drawings. The data link is now labeled as "31" since its previous reference numeral was previously used. The specification has been likewise amended. No new matter has been added.

Claims 1-5, 7-12, and 14-19 stand rejected under 35 U.S.C. 102(a) as being anticipated by U.S. Patent 6,229,888 to Milovslavsky. Claims 6 and 13 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Milovslavsky in view of an article to Brady ("Virtual Help Desks Enhance Call Center Services", October 1998).

These rejections are respectfully traversed based on the following discussion.

Briefly, the present invention addresses the problem of transferring call associated data (such as customer reference numbers, customer ordering history, credit information, etc.) among multiple telecommunication switches. As explained in the background section, when a call is received by a call center, the caller's (i.e. customer's) call associated data is retrieved by a first server based on, for example, the caller's Automatic Identification Number (AIN). This information may then be presented on an agent's screen during the call. Unfortunately, if the call was transferred to anther service center, for example using a different PBX switch, the call associated data did not follow. Thus that agent would not have benefit of this information as he spoke to the customer.

According to embodiments of the invention a telecommunication system and includes a first type of telecommunication switch and a first server coupled to the telecommunication switch. The system further includes a second type of telecommunication switch and a second server coupled to the second type of telecommunication switch. A data network link coupled between the first server and the second server allows call-associated data to be transferred between servers when a telephone call is transferred from the first type of telecommunication switch to second type of telecommunication switch.

With regard to the 102 rejection, the Examiner has relied on Miloslavsky for substantially teaching the invention as claimed. Miloslavsky appears to be directed to a system for operating a plurality of call centers. Similar to the present invention, Miloslavsky appears to address the issue of routing calls to various call centers as well as providing customer information to the agents. However, unlike the present invention, Miloslavsky uses a "stat-server 190" and a "routing-server 192" (in addition to the claimed first and second servers) to ensure that the customer information follows the transferred call to the agent at the second location to which a call was transferred to. This appears to be an extra layer of complexity not present in the applicant's claimed invention.

In contrast, rather than using additional servers as does Miloslavsky to transfer customer information, the second server of Applicant's claimed invention uses the area code prefix of the transferred call to determine on its own the source of the call and thereafter may request the customer information be sent via the data link. Support for this feature may be found on page 5, lines 18-24 of the application as filed. Using the area code prefix to determine the source of the call is not taught or suggested by Miloslavsky.

All independent claims have been amended to recite this feature. In particular, claim 1 recites:

"...a second server coupled to said second type of telecommunication

switch, said second server to determine a source of the transferred call as the first server by an area code prefix; and

a data network link coupled between said first server and said second server, the second server to request the call associated data from the first server" (emphasis added).

Similarly, independent claim 9 recites:

transferring the telephone call to a second type of telephone switch having a second server connected thereto;

said second server determining a source of the transferred telephone call as the first server by an area code prefix;

requesting the call-associated data from a first server coupled to said first type of telephone switch, the call-associated data comprising details of a customer account" (emphasis added).

Finally, independent claim 17 recites:

transferring the telephone call to a second type of telephone switch;

determining a source of the telephone call at a second server coupled to said second type of telephone switch via an area code prefix" (emphasis added).

MPEP § 2131 mandates that "TO ANTICIPATE A CLAIM, THE REFERENCE MUST TEACH EVERY ELEMENT IN THE CLAIM". Furthermore, the MPEP, citing Richardson v. Suzuki Motor Co., 9 USPQ2d 1051, 1053 (Fed. Cir. 1987), states "[t]he identical invention must be shown in as complete detail as is contained in the... claim" (emphasis added).

Here, Miloslavsky does not teach or suggest having the second server, to which the call was transferred, using an area code prefix to determine the source of the call in order to request the customer information.

It is therefore respectfully submitted that the rejections to the claims are improper under Section 102 as Miloslavsky cannot anticipate the rejected claims since they do not "teach the identical invention". Based on the above

discussion with reference to the MPEP guidelines, it is respectfully requested that the rejections based on 35 U.S.C. § 102 be withdrawn.

With regard to the §103(a) rejections based on the combination of Miloslavsky and Brady, this rejection is also respectfully traversed.
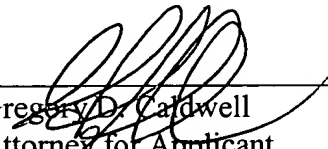
The Examiner has relied on Brady for teaching that a data link may be a TCP/IP link. However, the combination of Miloslavsky and Brady still fail to teach or suggest using an area code prefix to determine the source of the call in order to request the customer information. Thus, in the absence of such a teaching it is respectfully submitted that this combination does not make a case for prima facie obviousness and the rejection should be withdrawn.

In view of the foregoing, it is respectfully requested that the application be reconsidered, that claims 1 and 3-9 and 12-20 be allowed and that the application be passed to issue.

Should the examiner find the application to be other than in condition for allowance, the examiner is requested to contact Kevin A. Reif at (703) 633-6834 to discuss any other changes deemed necessary in a telephonic interview. Please charge any shortages and credit any overcharges to our Deposit Account number 02-2666.

Respectfully submitted,
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN, LLP

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Gregory D. Caldwell
Attorney for Applicant
Reg. No. 39,926

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, CA 90025-1026